YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT
1947 Galileo Court, Suite 103; Davis, CA 95618
(530) 757-3650

TITLE V PERMIT STATEMENT OF BASIS ADDENDUM

PERMIT NUMBER: F-00012-7

ENGINEER: Gary Ma

DATE: June 18, 2009

Facility Name:	BP West Coast Products, LLC
Mailing Address:	1601 South River Road West Sacramento, CA 95691
Location:	1601 South River Road West Sacramento, CA 95691
Responsible Official:	John Barrella
Title:	Sacramento Terminal Manager
Application Contact:	Debra Portello
Title:	Health, Safety, Security, and Environmental Advisor
Phone:	(510) 231-4704

I. FACILITY DESCRIPTION

The BP West Coast Products, LLC - Sacramento Terminal (henceforth referred to as "BP" for the purposes of this document) is a petroleum bulk storage and loading terminal operation. The facility receives gasoline and diesel products by underground pipeline and ethanol products by truck and rail. These products are then stored in bulk storage tanks. The products are dispensed by way of two, two-lane truck loading racks connected to a vapor recovery system that utilizes a vapor bladder tank and a vapor combustion unit.

II. PROPOSED REVISIONS

BP is proposing a significant Title V Permit modification for the modification of existing emission unit P-43-01(a) [Tank #1] - a bulk aboveground gasoline storage tank (District Authority to Construct application C-09-114). The facility has

proposed to replace the unit's existing vapor mounted resilient toroid primary seal with a new mechanical shoe primary seal.

The facility is current operating under Title V Permit F-00012-6, effective March 20, 2008. This Title V Permit Statement of Basis Addendum only reflects the Title V Permit modifications proposed in District Authority to Construct application C-09-114 and its applicable regulations. Emission units that are not affected by the proposed changes were evaluated in the original Statement of Basis or previous addendums.

III. SIGNIFICANT EMISSION UNIT INFORMATION

Each emission unit has been constructed pursuant to issuance of an Authority to Construct (ATC) in accordance with District Rule 3.1 and District Rule 3.4.

Identification Number: **P-43-01(a1)** [Tank #1]

Equipment Description: 2,814,000 gallon welded gasoline storage tank.

Control Equipment: Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

IV. TITLE V APPLICABILITY

The facility's potential to emit for volatile organic compounds (VOC) exceeds the District Title V threshold of 25 tons per year and is therefore subject to the requirements of District Rule 3.8. The facility emission totals are listed in Table 1:

Table 1. Criteria Pollutant Emissions

Criteria Pollutant Emissions (tons per year)					
Emission Unit Name	**VOC**	**CO**	**NO_x**	**SO_x**	**PM_{10}**
P-43-01(a1) [Tank #1]	3.33	-	-	-	-
P-44-01(a) [Tank #3]	3.20	-	-	-	-
P-45-01(a) [Tank #4]	3.13	-	-	-	-
P-46-01(a) [Tank #7]	0.04	-	-	-	-
P-47-01(a) [Tank #8]	0.04	-	-	-	-
P-48-01(a) [Tank #9]	0.04	-	-	-	-
P-49-01(a1) [Tank #10]	0.04	-	-	-	-

P-50-01(a1) [Tank #11]	0.04	-	-	-	-
P-51-01(a) [Tank #12]	0.04	-	-	-	-
P-54-93(a4) [Tank #15]	1.18	-	-	-	-
P-66-93(a1) [Tank #16]	0.96	-	-	-	-
P-55-93(a2) [Tank #17]	0.20	-	-	-	-
P-45-94(a2) [Tank #18]	1.38	-	-	-	-
P-69-93(a1) [Tank #19]	0.09	-	-	-	-
P-46-94(a1) [Tank #21]	0.09	-	-	-	-
P-65-95(a1) [Loading Racks]	17.97	71.92	13.22	-	-
P-93-02 [Ethanol Truck Off-Loading]	0.01	-	-	-	-
P-39-03 [Ethanol Railcar Off-Loading]	0.04	-	-	-	-
P-1-90(t) [Waste-water Separator]	0.09	-	-	-	-
TOTAL	31.91	71.92	13.22	0.00	0.00

V. APPLICABLE FEDERAL REQUIREMENTS

Rule 2.3 - Ringelmann Chart

Rule Description

This rule specifies the allowable opacity limit for sources in the District. The version of the rule used in this evaluation was adopted on October 1, 1971 and is part of the current California State Implementation Plan (SIP).

Compliance Status

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

Permit Condition

The Permit Holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more

than 3 minutes in any one hour which is:

a. As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines; or
b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this permit condition. [District Rule 2.3]

Rule 2.5 - Nuisance

Rule Description

This rule requires that sources are not a public nuisance. The version of the rule used in this evaluation was adopted on October 1, 1971 and is part of the current California SIP.

Compliance Status

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

Permit Condition

The Permit Holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property. [District Rule 2.5]

[The permit condition is federally enforceable because it derives from District Rule 2.5 - Nuisance which is currently part of the California SIP. The District is taking steps to remove District Rule 2.5 from the SIP. Once the U.S. Environmental Protection Agency (EPA) has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only.]

Rule 2.17 - Circumvention

Rule Description

This rule prevents sources from concealing emissions to the atmosphere. The version of the rule used in this evaluation was adopted on October 1, 1971 and is

part of the current California SIP.

Compliance Status

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

Permit Condition

The Permit Holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations. [District Rule 2.17]

Rule 2.21 - Organic Liquid Storage and Transfer

Rule Description

This rule specifies requirements for organic liquid storage and/or transfer operations to limit emissions of VOC. The version of the rule used in this evaluation was adopted on September 14, 2005 and is part of the current California SIP.

Compliance Status

The rule applies to any storage tank with a capacity of greater than 250 gallons, any gasoline bulk plant, any terminal, or any transport vessel that stores or transfers an organic liquid with a true vapor pressure of 0.5 psia or greater - including P-43-01(a1) [Tank #1]. The source is currently in compliance with the rule.

Permit Conditions

Organic liquid shall not be visible above the floating roof. [District Rule 2.21, §301.2]

The floating roof shall be in contact with the liquid contents (but not necessarily in complete contact with it) at all times except when the storage tank is completely emptied, and subsequently refilled. During this period, emptying or refilling shall be a continuous process. [District Rule 2.21, §301.3]

The Permit Holder shall provide written notification to the Air Pollution Control Officer (APCO) at least seven (7) days prior to landing the floating roof on its legs. [District Rule 2.21, §301.4]

The installation of a new or replacement primary seal shall be a mechanical shoe seal or liquid mounted seal. For existing resilient toroid seals, replacement means adding, replacing, or altering more than 5% of the seal foam or cover material. [District Rule 2.21, §301.5]

The floating roof shall consist of two seals, one above the other; the one below shall be referred to as the primary seal, and the one above shall be referred to as the secondary seal. [District Rule 2.21, §303.1]

Vapor concentrations above an internal floating roof shall not exceed 30% of its lower explosive limit (LEL). [District Rule 2.21, §303.2]

The tank shall be equipped with at least three (3) viewing ports. The viewports shall be installed on the fixed roof an equidistance apart and in such a manner so that each viewport provides an unobstructed view of the tank wall and roof seal. An alternate number or size of viewports may be approved at the discretion of the APCO. [District Rule 2.21, §303.3]

Fixed roof support columns and wells shall be equipped with a sliding gasketed cover or with a flexible fabric sleeve. [District Rule 2.21, §305.1.a]

Ladder wells shall be equipped with a gasketed cover. The cover shall be closed at all times, with no visible gaps, except when the well must be opened for access. [District Rule 2.21, §305.1.b]

Slotted and solid guidepoles shall comply with the requirements specified in District Rule 2.21, Section 305.2.h. [District Rule 2.21, §305.1.c]

Vacuum breakers shall be equipped with a gasket, with no visible gaps, and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 2.21, §305.1.d & §305.2.b]

Rim vents shall be equipped with a gasket, with no visible gaps, and shall be set to open only when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [District Rule 2.21, §305.1.d & §305.2.c]

Each access hatch and gauge float well shall be equipped with a cover that is gasketed and bolted. The cover shall be closed at all times, with no visible gaps, except when the hatch or well must be opened for access. [District Rule 2.21, §305.1.d & §305.2.g]

There shall be no holes, tears, or openings which allow the emission of organic vapors through the secondary seal. [District Rule 2.21, §306.1 & §307.1]

There shall be no holes, tears, or openings in the primary seal envelope surrounding the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric. [District Rule 2.21, §306.1]

The geometry of the shoe shall be such that the gap between the shoe and the storage tank shell shall not exceed twice the seal gap criteria for a vertical length greater than 18 inches. [District Rule 2.21, §306.3]

No gap between the storage tank shell and the primary seal shall exceed:

a. 1-1/2 inch;
b. 1/2 inch for a cumulative length greater than 10% of the circumference of the tank;
c. 1/8 inch for a continuous length of more than 10% of the circumference of the tank;
d. 1/8 inch for a cumulative length greater than 30% of the circumference of the tank. [District Rule 2.21, §306.4]

Any secondary seal shall extend from the floating roof to the storage tank shell and shall not be attached to the primary seal. [District Rule 2.21, §306.5 & §307.3]

No gap between the storage tank shell and the secondary seal shall exceed:

a. 0.06 inch;
b. 0.02 inch for a cumulative length greater than 5% of the circumference of the tank excluding gaps less than 1.79 inches from vertical weld seams. [District Rule 2.21, §306.5 & §307.3]

The secondary seal shall allow easy insertion of probes up to 1-1/2 inch in width in order to measure gaps in the primary seal. [District Rule 2.21, §306.7]

Organic liquids subject to District Rule 2.21 shall not be discarded to public sewers, stored in open containers, or handled in any other manner that would result in evaporation to the atmosphere. [District Rule 2.21, §314]

The degassing of any storage tank shall be controlled by a system which collects and processes all organic vapors and gases and has an abatement efficiency of at least 90% by weight. The system shall be operated until the concentration of volatile organic compounds in the tank is less than 10,000 ppm expressed as methane as determined in accordance with the test method specified in Section 605 of District Rule 2.21. [District Rule 2.21, §315]

The Permit Holder shall submit a maintenance plan to the APCO at least seven (7) days prior to performing maintenance on any storage tank. The plan shall state the equipment Permit to Operate number (unit identification number), a detailed description of the maintenance to be performed, the expected duration of the maintenance, the reason that the maintenance is necessary, emission control measures that will be employed, and the effect of not performing the maintenance. [District Rule 2.21, §501]

The Permit Holder shall submit written notification to the APCO at least 7 days prior to performing monitoring on any storage tank. [District Rule 2.21, §502]

The Permit Holder shall visually inspect the secondary seal, floating roof, and deck fittings and use an explosimeter that is calibrated in accordance with the manufacturer's specifications to measure the LEL of the storage tank. For each storage tank, inspections and measurements shall be completed at least once every 3 months at a distance of no less than 4 feet from the storage tank viewport or access hatch. [District Rule 2.21, §502.2.a]

The Permit Holder shall perform complete gap measurements of the primary and secondary seals at least once every 10 years. [District Rule 2.21, §502.2.b]

The Permit Holder shall perform complete gap measurements of the primary and secondary seals each time the tank is emptied and degassed. [District Rule 2.21, §502.2.b]

The Permit Holder shall perform complete gap measurements of all deck fittings at least once every 10 years and each time the tank is emptied and degassed. [District Rule 2.21, §502.2.c]

The Permit Holder shall conduct all visual inspections, LEL measurements, and gap measurements in accordance with the District-approved report format. [District Rule 2.21, §502.2]

The Permit Holder shall submit all monitoring reports to the APCO within 45

calendar days after the monitoring work is completed. All monitoring reports shall include sufficient detail to verify compliance with all applicable requirements of District Rule 2.21. [District Rule 2.21, §503.1]

The Permit Holder shall submit throughput reports to the APCO no later than March 31 for the previous calendar year. Storage tank throughput reports shall include the actual quarterly volume of organic liquid transferred into each tank. Bulk loading throughput reports shall include the actual quarterly volume of organic liquid transferred. [District Rule 2.21, §503.3]

The Permit Holder shall maintain accurate records to demonstrate compliance in accordance with the requirements of District Rule 2.21, Sections 501, 502, and 503 on site for a period of at least 5 years and make such records available to the APCO upon request. [District Rule 2.21, §504]

Streamlining Demonstration

For P-43-01(a1) [Tank #1], the following requirement of District Rule 2.21 can be streamlined by a permit condition required by District Rule 3.4, New Source Review. The streamlined permit condition is shown below:

Streamlined Permit Condition: The tank shall only be used to store organic liquid with a true vapor pressure less than 11.0 psia under actual storage conditions, as determined by the test methods specified in Section 602 of District Rule 2.21 or an alternative test method pursuant to Section 609 of District Rule 2.21. [District Rule 2.21, §301.1 & District Rule 2.21, §609]

Permit Condition: The tank shall only be used to store gasoline with a true vapor pressure less than 11.0 psia under actual storage conditions, as determined by the test methods specified in Section 602 of District Rule 2.21 or an alternative test method pursuant to Section 609 of District Rule 2.21. [District Rule 3.4 & District Rule 2.21, §609]

Rule 2.23 - Fugitive Hydrocarbon Emissions

Rule Description

This rule specifies requirements for the control of fugitive hydrocarbon emissions from oil and gas production and processing facilities, refineries, chemical plants, gasoline terminals, and pipeline transfer stations in conformance with Reasonably Available Control Technology determinations approved by CARB to meet the

requirements of the California Clean Air Act. The version of the rule used in this evaluation was adopted on August 13, 1997 and is part of the current California SIP.

Compliance Status

The rule applies to all equipment components associated with the storage and transfer of gasoline - including P-43-01(a1) [Tank #1]. Section 102 - Applicability specifically lists gasoline terminals, but makes no mention of diesel or ethanol terminals. Therefore, all equipment components associated with the storage and transfer of diesel and ethanol are not subject to this rule. The source is currently in compliance with the rule.

Permit Conditions

All pump seals, compressor seals, and pressure relief devices shall be inspected for leaks once during every manned operating shift or every eight-hour period. A leak shall include any liquid leak, a visual vapor leak, audible leaks, the presence of bubbles using soap solutions, or a leak identified by a vapor analyzer. [District Rule 2.23, §301.1.a]

Any leak which is identified during the inspection of components shall be measured to quantify emission concentrations according to EPA Reference Method 21. [District Rule 2.23, §301.1.b]

All components shall be inspected quarterly according to EPA Reference Method 21, except as provided below:

a. All inaccessible components shall be inspected annually according to EPA Reference Method 21.
b. All threaded connections and flanges shall be inspected for leaks according to EPA Reference Method 21 immediately after being placed in service and annually thereafter.
c. The inspection frequency for components, except pump seals and compressor seals, may change from quarterly to annually, provided that all of the following conditions are met:
    1. All components at the facility have been successfully operated and maintained with no liquid leaks and no major gas leaks exceeding 0.5 percent of the total components inspected per inspection period for twelve consecutive months, and
    2. The above is substantiated by documentation and written approval obtained from the APCO.

d. Any annual inspection frequency approved by the APCO shall revert to quarterly, should any liquid leak or major gas leak be detected exceeding 0.5 percent of the total components inspected per inspection period. [District Rule 2.23, §301.2, §301.3, §301.5, §301.6, and §301.8]

A pressure relief device shall be inspected according to EPA Reference Method 21 within three (3) calendar days after every pressure relief. [District Rule 2.23, §301.4]

All leaking components shall be affixed with brightly colored, weatherproof tags showing the date of leak detection. These tags shall remain in place until the components are repaired and reinspected. [District Rule 2.23, §301.7]

All non-critical components shall be successfully repaired or replaced within the following time periods after detection of the leak according to the Table 2, Repair Periods. [District Rule 2.23, §302.1.a]

Table 2. Repair Periods

Type of Leak	Time Period[1]
Minor Gas Leak	14 Days
Major Gas Leak	5 Days
Major Gas Leak over 50,000 ppm	1 Day[2]
Major Liquid Leak	1 Day[2]
Minor Liquid Leak	2 Days[2]

1. Day means a 24 hour period from the time of leak detection.
2. Unless prohibited by California Occupational Safety and Health Administration (CAL OSHA) standards.

Leaks from components shall be immediately minimized to stop or reduce leakage to the atmosphere. [District Rule 2.23, §302.1.b]

All leaks from critical components shall be minimized to the extent possible and shall be replaced with Best Available Control Technology equipment as determined in accordance with District Rule 3.4, NEW SOURCE REVIEW, during the next process unit turnaround. [District Rule 2.23, §302.1.c]

All repaired or replaced components shall be re-inspected per EPA Reference Method 21 by the Permit Holder within 30 days of the repair or replacement. [District Rule 2.23, §302.2]

A component or parts which incur five repair actions for a liquid or major gas leak within a continuous twelve-month period shall be replaced with Best Available Control Technology equipment as determined in accordance with District Rule 3.4, NEW SOURCE REVIEW. [District Rule 2.23 §302.3]

Open-ended lines and valves located at the end of lines shall be sealed with a blind flange, plug, cap, or a second closed valve at all times except during operations. Operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs. [District Rule 2.23, §303]

Hatches shall be closed at all times except during sampling, adding process materials, or attended maintenance operations. [District Rule 2.23, §304]

The Permit Holder shall not use a pressure relief device on any equipment if the concentration of volatile organic compounds and methane in such a device exceeds 100 ppm (expressed as methane) above background. [District Rule 2.23, §305.2]

During the next process unit turnaround, the Permit Holder shall replace a non-repairable pressure relief device with a device that meets the requirements of District Rule 2.23, Section 305.2. For the purposes this permit condition, a non-repairable pressure relief device is any such device that cannot be taken out of service without shutting down the process which it serves. [District Rule 2.23, §305.3]

During the next process unit turnaround, the Permit Holder shall replace an inaccessible pressure relief device with a device that meets the requirements of District Rule 2.23, Section 305.2. [District Rule 2.23, §305.4]

All major components and critical components shall be clearly and visibly physically identified for inspection, repair, replacement, and record-keeping purposes. [District Rule 2.23, §401.1]

All major, critical, and inaccessible components except flanges and threaded connections shall be clearly identified in diagrams for inspection, repair, replacement, and record-keeping purposes as approved by the APCO. [District Rule 2.23, §401.2]

The information required for component identification shall be submitted to the APCO upon request. [District Rule 2.23, §401.3]

The Permit Holder shall notify the APCO in writing of any change in the identification of a major component. [District Rule 2.23, §401.4]

All records of operator inspection and repair shall be maintained at the facility for the previous five (5) year period and made available at the time of District inspection. [District Rule 2.23, §501]

The Permit Holder shall maintain an inspection log, containing at a minimum, the following:

a. Name, location, type of components, and description of any unit where leaking components are found;
b. Date of leak detection, emission level (ppm) of leak, and method of leak detection;
c. Date and emission level (ppm) of recheck after leak is repaired; and
d. Total number of components inspected and a total number and percentage of leaking components found by component types. [District Rule 2.23, §502]

Records of leaks detected by a quarterly or annual operator inspection, and each subsequent repair and reinspection, shall be submitted to the APCO upon request. [District Rule 2.23, §503]

Rule 3.1 - General Permit Requirements

Rule Description

The purpose of this rule is to provide an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits. The version of the rule used in this evaluation was adopted on February 23, 1994 and is part of the current California SIP.

Compliance Status

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

Permit Conditions

No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the

Air Pollution Control Officer as specified in Section 401 of District Rule 3.1. [District Rule 3.1, §301.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the Air Pollution Control Officer. [District Rule 3.1, §302.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the Air Pollution Control Officer or the Hearing Board. [District Rule 3.1, §302.2]

The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1, §405.3]

Rule 3.4 - New Source Review

Rule Description

This rule applies to all new stationary sources and emission units and all modifications to existing stationary sources and emission units which are subject to District Rule 3.1, General Permit Requirements, and which, after construction or modification, emit or may emit any affected pollutants. This rule shall not apply to prescribed burning of forest, agriculture or range land, road construction, or any other non-point source common to timber harvesting or agricultural practices. The purpose of this rule is to provide for the review of new and modified stationary air pollution sources and to provide mechanisms, including emission offsets, by which authorities to construct such sources may be granted without interfering with the attainment or maintenance of ambient air quality standards. The version of the rule used in this evaluation was adopted on August 13, 1997 and is part of the current California SIP.

Compliance Status

The source has satisfied the provisions of New Source Review. The New Source Review requirements are imposed on District Authority to Construct C-09-114. The New Source Review Requirements are shown below.

Permit Conditions

The VOC emissions from P-43-01(a1) [Tank #1] shall not exceed 1,442 lb/1st calendar quarter, 1,768 lb/2nd calendar quarter, 1,949 lb/3rd calendar quarter, 1,510 lb/4th calendar quarter, and 3.33 tons/year. [District Rule 3.4/C-09-114]

For P-43-01(a1) [Tank #1], the amount of gasoline transferred shall not exceed 49.85 million gallons/1st calendar quarter, 49.85 million gallons/2nd calendar quarter, 49.85 million gallons/3rd calendar quarter, 49.85 million gallons/4th calendar quarter, and 199.4 million gallons/year. [District Rule 3.4/C-09-114]

The tank shall only be used to store gasoline with a true vapor pressure less than 11.0 psia under actual storage conditions, as determined by the test methods specified in Section 602 of District Rule 2.21 or an alternative test method pursuant to Section 609 of District Rule 2.21. [District Rule 3.4/C-09-114 & District Rule 2.21, §609]

The Permit Holder shall maintain records of the actual volume of gasoline transferred into this tank (including inter tank transfers) on a quarterly basis. Records shall be maintained for a period of five (5) years and shall be made readily available to the Air Pollution Control Officer upon request. [District Rule 3.4/C-09-114]

Rule 3.8 - Federal Operating Permits

Rule Description

This rule implements the requirements of Title V of the Federal Clean Air Act as amended in 1990 (CAA) for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants. The version of the rule used in this evaluation was adopted on April 11, 2001 and is part of the current California SIP.

Compliance Status

The source is currently in compliance with the rule. The source was issued an renewed Title V operating permit on March 20, 2008. The source currently has one application for Authority to Construct being processed according to the District's Enhanced New Source Review (NSR) guidelines in District Rule 3.4, Section 404. The District Enhanced NSR program provides that if the provisions of District Rule 3.8, Federal Operating Permits are followed at the time of District permit for construction, including noticing requirements, then the changes to the Title V Permit are administrative changes after the construction is completed and the District permit is issued.

The proposed changes are considered significant permit modifications because they involve a case-by case determination of emission standards.

A significant permit modification requires that the District provide notice of and opportunity to review the proposed changes in accordance with District Rule 3.8, Section 409.1.

Permit Conditions

Right of Entry

The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:

a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
b. Inspection and duplication of records required by the permit to operate; and
c. Source sampling or other monitoring activities. [District Rule 3.8, §302.10]

Compliance with Permit Conditions

The Permit Holder shall comply with all Title V permit conditions. [District Rule 3.8, §302.11a]

The permit does not convey property rights or exclusive privilege of any sort. [District Rule 3.8, §302.11b]

Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [District Rule 3.8, §302.11c]

The Permit Holder shall not use the "need to halt or reduce a permitted activity in

order to maintain compliance" as a defense for non-compliance with any permit condition. [District Rule 3.8, §302.11d]

A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [District Rule 3.8, §302.11e]

Within a reasonable time period, the Permit Holder shall furnish any information requested by the APCO, in writing, for the purpose of determining:
a. Compliance with the permit; or
b. Whether or not cause exists for a permit or enforcement action. [District Rule 3.8, §302.11f]

Emergency Provisions

Within two weeks of an emergency event, the Permit Holder shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:
(i) An emergency occurred;
(ii) The Permit Holder can identify the cause(s) of the emergency;
(iii) The facility was being properly operated at the time of the emergency;
(iv) All steps were taken to minimize the emissions resulting from the emergency; and
(v) Within two working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken; and
In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12]

Severability

If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [District Rule 3.8, §302.13]

Compliance Certification

The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every 12 months unless required more frequently by an applicable requirement. [District Rule 3.8, §302.14a]

The compliance certification shall identify the basis for each permit term or

condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of District Rule 3.8. [District Rule 3.8, §302.14b]

The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [District Rule 3.8, §302.14c]

The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. [District Rule 3.8, §302.14d]

Permit Life

The Title V permit shall expire five years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [District Rule 3.8, §302.15]

Payment of Fees

The Permit Holder shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [District Rule 3.8, §302.16]

Permit Revision Exemption

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [District Rule 3.8 §302.22]

Application Requirements

The Permit Holder shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [District Rule 3.8, §402.2]

The Permit Holder shall submit a standard District application for each emission unit

affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the Permit Holder shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [District Rule 3.8, §402.3]

The Permit Holder shall submit a standard District application for each emission unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the Permit Holder shall include the following:

a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
b. Proposed permit terms and conditions; and
c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [District Rule 3.8, §402.4]

Permit Reopening for Cause

Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:

a. The need to correct a material mistake or inaccurate statement;
b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is 3 years or greater, no later than 18 months after the promulgation of such requirement (where less than 3 years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [District Rule 3.8, §413.1]

Record-keeping

The Permit Holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:

(i) Date, place, and time of sampling;
(ii) Operating conditions at the time of sampling;
(iii) Date, place, and method of analysis; and
(iv) Results of the analysis. [District Rule 3.8, §302.6a]

The Permit Holder shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application. [District Rule 3.8, §302.6b]

Reporting Requirements

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection. [District Rule 3.8, §302.7a]

A monitoring report shall be submitted at least every six months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7. a of District Rule 3.8. [District Rule 3.8, §302.7b]

All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [District Rule 3.8, §302.7c]

Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [District Rule 3.8, §302.7e]

40 CFR Part 60 Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids

Rule Description

This subpart provides performance standards for petroleum liquid storage vessels that commenced construction or modification after June 11, 1973 and prior to May 19, 1978.

Compliance Status

Per Section 60.110(c)(1) and 60.110(c)(2), the provisions of this subpart do not

apply to P-43-01(a1) [Tank #1] because the tank is not a petroleum liquid storage tank that: (a) has a capacity greater than 40,000 gallons but not exceeding 65,000 gallons, and commenced construction or modification after March 8, 1974 and prior to May 19, 1978; or (b) has a capacity greater than 65,000 gallons, and commenced construction or modification after June 11, 1973 and prior to May 19, 1978.

Permit Conditions

No permit conditions from this subpart are required.

40 CFR Part 60 Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids

Rule Description

This subpart provides performance standards for petroleum liquid storage vessels that commenced construction or modification after May 18, 1978 and prior to July 23, 1984.

Compliance Status

Per Section 60.110a(a), the provisions of this subpart do not apply to P-43-01(a1) [Tank #1] because the tank was not constructed or modified after May 18, 1978 and prior to July 23, 1984.

Permit Conditions

No permit conditions from this subpart are required.

40 CFR Part 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)

Rule Description

This subpart provides performance standards for volatile organic liquid (including petroleum liquid) storage vessels that commenced construction or modification after July 23, 1984.

Compliance Status

Per Section 60.110b(a), the subpart applies to P-43-01(a1) [Tank #1] because the tank has a storage capacity greater than 75 cubic meters (19,813 gallons) and the tank was constructed or modified after July 23, 1984. The source is currently in compliance with the subpart.

Permit Conditions

For P-43-01(a1) [Tank #1], the internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [40 CFR 60.112b(a)(1)(i)]

For P-43-01(a1) [Tank #1], the internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof: Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. [40 CFR 60.112b(a)(1)(ii)(B)]

For P-43-01(a1) [Tank #1], each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [40 CFR 60.112b(a)(1)(iii)]

For P-43-01(a1) [Tank #1], each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR 60.112b(a)(1)(iv)]

For P-43-01(a1) [Tank #1], automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR 60.112b(a)(1)(v)]

For P-43-01(a1) [Tank #1], rim space vents shall be equipped with a gasket and are

to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR 60.112b(a)(1)(vi)]

For P-43-01(a1) [Tank #1], each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 60.112b(a)(1)(vii)]

For P-43-01(a1) [Tank #1], each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR 60.112b(a)(1)(viii)]

For P-43-01(a1) [Tank #1], each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)]

For P-43-01(a1) [Tank #1], the Permit Holder must comply with one of the following two options:

(i) Visually inspect the vessel as specified in the following paragraph at least every 5 years: Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permit Holder shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL; or

(ii) Visually inspect the vessel as specified in the following paragraph: visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permit Holder shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of

actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 60.113b(a)(1-4)]

For P-43-01(a1) [Tank #1], the Permit Holder shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of this section is not planned and the Permit Holder could not have known about the inspection 30 days in advance or refilling the tank, the Permit Holder shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling. [40 CFR 60.113b(a)(5)]

For P-43-01(a1) [Tank #1], the Permit Holder shall keep records and furnish reports as required by paragraphs (a), (b), or (c) of this section depending upon the control equipment installed to meet the requirements of §60.112b. The Permit Holder shall keep copies of all reports and records required by this section, except for the record required by (c)(1), for at least 5 years. The record required by (c)(1) will be kept for the life of the control equipment. [40 CFR 60.115b]

For P-43-01(a1) [Tank #1], the Permit Holder shall keep a record of each inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [40 CFR 60.115b(a)(2)]

For P-43-01(a1) [Tank #1], if any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(3)]

For P-43-01(a1) [Tank #1], after each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be

furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made. [40 CFR 60.115b(a)(4)]

For P-43-01(a1) [Tank #1], the Permit Holder shall keep copies of all records required by this section, except for the record required by §60.116b(b), for at least 2 years. The record required by §60.116b(b) will be kept for the life of the source. [40 CFR 60.116b(a)]

For P-43-01(a1) [Tank #1], the Permit Holder of each storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR 60.116b(b)]

40 CFR Part 64 - Compliance Assurance Monitoring

Rule Description

This subpart provides guidelines for developing a compliance assurance monitoring (CAM) plan. The CAM plan requires that a stationary source monitor the appropriate parameters of a process or its control equipment, and/or measure the process' actual emissions, so as to ensure emission compliance on an on-going basis.

The CAM requirements apply to any pollutant specific emission unit at a major source that is required to obtain a Part 70 permit and which satisfies all of the following:

a. The unit is subject to an emission limit or standard for an applicable regulated air pollutant;
b. The unit uses a control device to achieve compliance with any such emission limitation or standard; and
c. The unit's pre-control device potential to emit of an applicable regulated pollutant is greater than or equal to that pollutants major source threshold.

Compliance Status

All emission units at the source are exempt from the requirements of this federal subpart, since none of these emission units have a pre-control device potential to emit greater than or equal to any of the major source thresholds - including P-43-

01(a1) [Tank #1]. Per Section 64.1, seals, lids, roofs, and other control measures that prevent the release of pollutants do not meet the definition of a control device.

Permit Condition

No permit conditions from this subpart are required.